

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: EHSAN ULLAH KHAN , aka Ehsan Khan, aka Ehsan U. Khan, and MISBAH EHSAN KHAN , aka Misbah Khan, aka Misbah E. Khan, Debtors	: : : : :	Chapter: 13 Case No.: 19-10715-elf
PNC BANK, NA , Movant, v. EHSAN ULLAH KHAN, MISBAH EHSAN KHAN and SCOTT F. WATERMAN, TRUSTEE , Respondents,	: : : : : : :	Motion for Relief from Stay

**ANSWER TO MOTION OF
PNC BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **PNC BANK** for Relief from Stay aver:

- 1-2. Admitted.
3. Denied to the extent the documents referenced do not speak for themselves.
4. Denied. Upon information and believe, the Trustee was appointed by the United States Trustee.
5. Denied to the extent the averments of paragraph 5 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.
6. Denied. Debtors reasonably believe that only the November and December payments were due on the date the Motion was filed. Debtors intent to make a payment on December 27, 2019, and a further payment utilizing the non-exempt portion of the personal injury settlement approved by this Court on December 23, 2019.
7. Denied. Upon information and belief, applicable law does not allow recoupment of bankruptcy attorneys' fees from Debtor.

8. Denied. See response to paragraph 6, above.
9. Denied. Debtors' Plan payments are current, through at the time the Motion was filed, a payment may have been made that was not yet reflected on the Trustee's records.
10. Denied. Debtors' ongoing payments provide Movant with adequate protection.
11. Denied to the extent the averments of paragraph 11 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.

WHEREFORE, Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN** respectfully pray(s) this Honorable Court for an Order than the Motion of **PNC BANK** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

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